

REMARKS/ARGUMENTS

The Applicants originally submitted Claims 1-26 in the application. In response to an election requirement, the Applicants provisionally selected Claims 1-7 without traverse and withdrew Claims 8-26. In previous responses, the Applicants amended Claims 1-3 and canceled dependent Claim 3 without prejudice or disclaimer. In the present response, the Applicants have not amended, canceled or added any claims. Accordingly, Claims 1-2 and 4-7 are currently pending in the application.

I. Rejection of Claims 1, 2 and 7 under 35 U.S.C. §103

The Examiner has rejected Claims 1, 2 and 7 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,087,834 to Tury, *et al.* The Applicant respectfully disagrees since Tury does not teach or suggest a centralized connector module as recited in independent Claim 1.

Tury relates to an apparatus and method for testing the electrical components and wiring contained in a lighting system. (See column 1, lines 5-7.) The Examiner asserts that the diagnostic tester 10 of Tury includes a dielectric body having interconnected terminal sets corresponding to components connectable thereacross and configured to provide terminating points for the components during normal operation thereof as recited in independent Claim 1 of the present invention. (See Examiner's Final Rejection, page 2.) The diagnostic tester 10, however, is a hand-held device that is used to test lighting systems. (See column 3, lines 46-47, and Abstract.) The diagnostic tester 10 does not provide terminating points for components of the lighting system during normal operation thereof but instead is connected to a diagnostic receptacle 22 for testing the lighting

system when the lighting system is not operating. (See column 1, lines 52-53, and column 5, lines 47-56.) During normal operation, a continuity plug 48 is inserted into the diagnostic receptacle 22. (See column 2, lines 18-24, and column 4, lines 14-16.) Tury actually teaches against the diagnostic tester 10 providing terminating points during normal operation since the diagnostic tester 10 is used when power to the lighting system is off (see column 1, lines 52-58). Tury, therefore, neither teaches or suggests a dielectric body having interconnected terminal sets corresponding to components connectable thereacross and configured to provide terminating points for the components during normal operation thereof as recited in independent Claim 1.

Thus, Tury fails to teach or suggest each element of independent Claim 1. As such, Tury does not provide a *prima facie* case of obviousness of independent Claim 1 and Claims dependent thereon. As such, Claims 1-2 and 7 are not unpatentable in view of Tury. Accordingly, the Applicant respectfully requests the Examiner to withdraw the §103(a) rejection of Claims 1-2 and 7 and allow issuance thereof.

II. Rejection of Claims 4 and 6 under 35 U.S.C. §103

The Examiner has rejected Claims 4 and 6 under 35 U.S.C. §103(a) as being unpatentable over Tury in view of U.S. Patent No. 3,728,616 to Cheek, *et al.* The Applicants respectfully disagree.

As discussed above, Tury does not teach or suggest a centralized connector module as recited in independent Claim 1. Cheek has not been cited to cure the deficiencies of Tury but to teach the subject matter of dependent Claims 4 and 6. Additionally, Cheek does not cure the

deficiencies of Tury since Cheek teaches an apparatus for testing the continuity and erroneous connections of a plurality of wired connections. (See column 1, lines 30-32.) Thus, instead of disclosing a central connector module including continuity circuits, Cheek teaches a separate device that is used to check continuity of circuits. Cheek, therefore, does not cure the deficiencies of Tury.

As such, Tury and Cheek, individually or in combination, does not teach or suggest each and every element of independent Claim 1 and Claims dependent thereon. Thus, the cited combination of Tury and Cheek does not provide a *prima facie* case of obviousness of independent Claim 1 and Claims 4 and 6 which depend thereon. The cited combination, therefore, does not render obvious Claims 4 and 6. Accordingly, the Applicants respectfully request the Examiner to withdraw §103(a) rejection of Claims 4 and 6 and allow issuance thereof.

III. Rejection of Claim 5 under 35 U.S.C. §103

The Examiner has rejected Claim 5 under 35 U.S.C. §103(a) as being unpatentable over Tury in view of U.S. Patent No. 6,323,652 to Collier, *et al.* The Applicants respectfully disagree. As discussed above, Tury does not teach or suggest a centralized connector module as recited in independent Claim 1. Collier discloses an electrical testing device for determining the continuity between ground terminals of an electrical power cord and determining the electrical grounding of an electrical power tool. (See Abstract.) Collier has not been cited to cure the deficiencies of Tury but to teach the subject matter of dependent Claim 5. As such, the cited combination of Tury and Collier does not provide a *prima facie* case of obviousness of independent Claim 1 and Claim 5 which

depends thereon. Accordingly, the Applicants respectfully request the Examiner to withdraw the §103(a) rejection of Claim 5 and allow issuance thereof.


IV. Conclusion

In view of the foregoing remarks, the Applicant now sees all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicits a Notice of Allowance for Claims 1-2 and 4-7.

The Applicant requests the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application. The Commissioner is hereby authorized to charge any fees, credits or overpayments to Deposit Account 08-2395.

Respectfully submitted,

HITT GAINES, PC

A handwritten signature in cursive script, appearing to read "J. Joel Justiss".

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